

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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GROSSBERG FIDUCIARIES LIMITED,

Plaintiff,

- against -

ZALMAN SILBER, GALACTIC LITIGATION
PARTNERS LLC and PAR MANAGERS LLC,

Defendants.
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19-cv-9952(KPF)

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the annexed affidavit of Fredrick Schulman, sworn to on December 6, 2019, the Memorandum of Law in support hereof, and all of the pleadings filed in this case, the defendants, Zalman Silber, Galactic Litigation Partners LLC and PAR Managers LLC, by their undersigned attorney, hereby move the Court for an order dismissing this action pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure and the doctrine of *forum non conveniens*.

Pursuant to Local Civil Rule 6.1, opposing affidavits and memoranda of law shall be served within fourteen (14) days of service of this motion.

Dated: December 6, 2019

Law Office of Sheldon H. Gopstein, Esq.

By: s/ Sheldon H. Gopstein
Sheldon H. Gopstein

275 Madison Avenue, 14th Floor
New York, NY 10016
Tel. (212) 363-2400
sg@gopsteinlaw.com

Attorney for Defendants,
Zalman Silber, Galactic Litigation Partners
LLC and PAR Managers LLC